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Counsel for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	2:10-CR-286-PMP-(GWF)
)	
KAREN TAPPERT,)	
)	
Defendant.)	

**STIPULATION TO CONTINUE HEARING
ON UNITED STATES' MOTION TO DISMISS
ENTITLE INSURANCE COMPANY'S CLAIM OF INTEREST**

The United States of America ("United States"), by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, and Alan F. Curley, counsel for EnTitle Insurance Company ("EnTitle"), hereby stipulate and agree to continue the hearing date on the United States' motion to dismiss EnTitle's third-party claim, to receive all or part of the funds embodied in the forfeiture judgment awarded by this Court in the criminal case of Karen Tappert, for sixty (60) days from the current, scheduled hearing date, or until February 14, 2014. The hearing is currently scheduled for December 16, 2013, and has been continued previously by order of the Court.

...

1 For their grounds the parties represent that they are continuing to attempt to reach a negotiated
2 settlement and are seeking to resolve their dispute through resort to the administrative process.
3 Specifically, the parties are pursuing the possibility of compensating EnTitle by evaluating, and acting
4 on, EnTitle's petition for remission, currently pending before the Department of Justice. The parties
5 request an additional sixty (60) days to complete the process of determining whether compensation
6 through the remission process is viable. If so, the need for further litigation will cease and EnTitle will
7 withdraw its third-party claim and the United States will, likewise, withdraw its motion to dismiss.
8 Counsel for the Government has discussed this matter with Alan F. Curley, legal representative to
9 EnTitle, and he has authorized the undersigned to represent to this Court that he concurs with this
10 stipulation. This stipulation is not submitted solely for the purpose to delay of for any other improper
11 purpose.

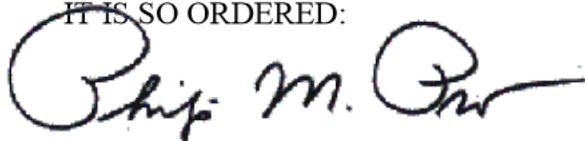
12 WHEREFORE, the parties jointly petition this Court to approve their stipulation to continue
13 the hearing date on the Government's Motion to Dismiss for sixty day from the current hearing date,
14 or until February 12, 2014 at 9:00 AM in Courtroom 7C.

15
16 DATED this 11th day of December, 2013.

17
18 Respectfully submitted,
19 DANIEL G. BOGDEN
United States Attorney

20 /s/ Michael A. Humphreys
21 MICHAEL A. HUMPRHEYS
22 Assistant United States Attorney

23 IT IS SO ORDERED:

24 

25 Philip M. Orr
26 U.S. District Court Judge
December 12, 2013

CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing **STIPULATION TO CONTINUE THE HEARING DATE ON THE UNITED STATES' MOTION TO DISMISS** was made by sending a copy of same by first class mail, addressed to the following addressee, on this 11th day of December, 2013:

Alan F. Curley
Robinson, Curley and Clayton, P.C.
300 South Wacker Dr.
Suite 1700
Chicago, Il 60606

/s/ Ray Southwick
Ray Southwick
Forfeiture Support Associates Paralegal